

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

(1) Jonathan A. Brownlee :
(Name of Plaintiff) (Inmate Number) :
Lackawanna County Prison :
1371 New Washington Ave Scranton, PA 18509 :
(Address) :

(2) _____ :
(Name of Plaintiff) (Inmate Number) :

(Address) :

(Each named party must be numbered,
and all names must be printed or typed)

vs.

CIVIL COMPLAINT

(1) Monroe County Correctional Facility (Stroudsburg, PA) :
(2) _____ :
(3) _____ :
(Names of Defendants)

(Each named party must be numbered,
and all names must be printed or typed)

FILED
SCRANTON

JUN 29 2018

PER

DEPUTY CLERK

TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS

☐ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

None

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ☒ Yes ☐ No
- B. Have you fully ~~exhausted~~ your available administrative remedies regarding each of your present claims? ☒ Yes ☐ No
- C. If your answer to "B" is Yes: See: Extra Sheets attached
1. What steps did you take? I filled out and filed request slip(s) and/or grievance form(s) requesting to be housed alone and not housed with inmates who threatened to rape me.
 2. What was the result? The request slip(s) and/or grievance form(s) request was reviewed and denied by supervising Correctional Officer(s) and signed.
- D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS

- (1) Name of first defendant: Monroe County Correctional Facility (Stroudsburg, PA)

Employed as Government Facility at exact street address unknown
 Mailing address: Manor Dr. Stroudsburg, PA 18360

- (2) Name of second defendant: _____
 Employed as _____ at _____
 Mailing address: _____
- (3) Name of third defendant: _____
 Employed as _____ at _____
 Mailing address: _____

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM See: Extra Sheets attached

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. Less than 2 years prior to June 24th, 2018; while housed in the protective custody unit of Monroe County Correctional Facility in Stroudsburg, PA, I overheard Correctional officers on the unit saying that they were going to move me into a cell with an inmate who had threatened to rape me

multiple times in the past (while on the unit) if I were to be moved into a cell with him.

2. I then frantically began to write a request slip (possibly handwriting "grievance form" atop as instructed to do in some conditions) stating on the document "please don't move me in with the inmate because he has sexually threatened me in the past, and he will! assault me if I am moved into a cell with him." I called the CO to my cell, verbally explained this to him, and gave him the request slip/grievance.
3. Correctional Officers then physically began to move me in with the rapist inmate although I verbally resisted, and they replied saying "You can not control where you're going to be housed." Later that night the inmate named "Counterman" raped me in multiple ways. The local police, supervising COs, and MCLC medical staff questioned, took reports, and examined me. I did not report some ways I was orally raped, which embarrassed.

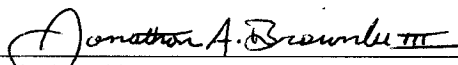
V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I request money damages compensation in the amount of \$80 Million
2. I want the court to acknowledge that Monroe County Correctional Facility - Stroudsburg, PA (Correctional Officers) allowed me to be raped by disregarding my request slip(s), grievance form(s)
3. I request the money damages because of the rape Monroe County Correctional Facility allowed to happen to me, because I did not deserve to be raped, and because I continue to suffer from the injuries of the ongoing psychological damage of traumatization.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24th day of June, 2018.



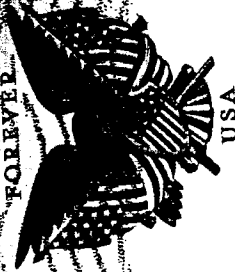
(Signature of Plaintiff)

Name: JONATHAN A. BROWNLEE III
Lackawanna County Prison
1371 N Washington Avenue
Scranton, PA 18509-2840

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PER. [Signature] DEPUTY CLERK

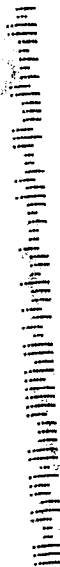


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c/o Clerk of Court
United States Courthouse
235 N. Washington Ave.
Scranton, PA 18501

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A CORRECTIONAL FACILITY



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